



Michael R. McDonald  
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September 14, 2023

**VIA ECF**

Honorable Jessica S. Allen, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: White, et al. v. Samsung Electronics America, Inc., et al.**  
**Case No. 17-1775 (MCA)(JSA)**

Dear Magistrate Judge Allen:

Gibbons P.C., along with Covington & Burling LLP, represent Defendant Samsung Electronics America, Inc. ("Samsung") in the above-referenced matter.

In accordance with Your Honor's judicial preferences for *pro hac vice* applications, we advise that Plaintiffs' counsel has consented to Samsung's application for the *pro hac vice* admissions of Jordan S. Joachim and Celin Carlo-Gonzalez from Covington & Burling LLP. Accordingly, we have submitted with this letter a proposed Consent Order granting Application for Admission *Pro Hac Vice* of Jordan S. Joachim and Celin Carlo-Gonzalez, along with a supporting Declaration of admission and good standing from Mr. Joachim and Ms. Carlo-Gonzalez and the Declaration of Michael R. McDonald.

If the form of the Proposed Order meets with Your Honor's approval, we ask that it be So Ordered and entered on the docket in this matter.

Thank you for your kind consideration and please do not hesitate to contact me should there be any questions.

Respectfully submitted,

s/ Michael R. McDonald  
Michael R. McDonald

Enclosure

cc: All Counsel of Record (via ECF)